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a unique ATM address, and wherein said functional group includes a plurality of servers, each of said plurality of servers, is assigned a unique ATM address, and is capable of servicing said client;

server means for enabling said processor to select a server capable of satisfying said routing request from said functional group, wherein said selection is transparent to said client; and

routing means for enabling said processor to determine a route from said client to said server through said network.

REMARKS

The Examiner's remarks in the Office Action dated April 24, 2000 have been carefully considered and the following remarks are presented in consideration thereof. In this response, claims 1, 6, 14, and 22 are amended to more clearly describe Applicants' invention. Claims 1-29 are currently pending.

The Office Action rejected claims 1-29 under 35 USC 103(a) as being unpatentable over U.S. Patent No. 5,870,555 to Pruett (hereinafter "Pruett") in view of U.S. Patent No. 5,673,263 to Basso et al. (hereinafter "Basso"). Applicants respectfully traverse the rejection for the following reasons. The method for establishing a *virtual circuit* from a client to one of a plurality of servers through a network as recited in claim 1 of the present invention, requires the steps of: receiving a request for connection from a client, *wherein the request specifies a functional group having a unique ATM address*, and wherein the functional group includes a plurality of servers, each capable of servicing the client, and wherein *each of the plurality of servers are assigned a unique ATM address*; selecting a server from the functional group, *wherein the selection is transparent to the client*; computing a route to the server; and establishing a virtual circuit from the client to the server via the route.

Pruett, on the other hand, discloses a system and method for compiling and reporting network information to a user. The invention facilitates a project manager from not having a access a plurality of file servers in order to gather detailed information about participants in a project. Thus, project participants are allocated to a functional group so that the project manager may obtain access to details of such participants. Col. 2, lines 10-20. Claim 1, as amended, recites *inter-alia* that a functional group is given a unique ATM address; each of the plurality of servers

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are assigned a unique ATM address; and that the selection of a server from the functional group is transparent to a client. None of these features are neither disclosed nor suggested by the prior art of record. Applicants, therefore, respectfully submit that claim 1 is not rendered obvious and is now in clear condition for allowance.

Further, the Office Action, on page 2, asserts that Pruett on Figure 1 discloses "a method for establishing a virtual circuit or logical connection from a client to one of a plurality of servers through a network. Applicants respectfully disagree. Figure 1 of Pruett merely discloses a client-server network where a client and a plurality of servers are connected to a network data bus. A network interface system (NIS) is connected to a network data bus 20 for communicating with network 10. None of the disclosure with respect to Figure 1 of Pruett teaches or suggest a "method for establishing a virtual circuit from a client to one of a plurality of servers through an ATM network" as recited in claim 1 of the present invention.

Furthermore, the functional group as disclosed in Pruett has no relation to the functional group as recited in claim 1 of the present invention. In Pruett, computer network users are assigned to primary or functional groups so that a project manager may have broader access to network information and information about project participants. Thus, Pruett discloses a system for compiling and reporting network information and allows a user broader access to network information than the user's assigned access level may allow. Col. 2, lines 50-60. The selection of a server is done in order to compile and report computer network information. This concept is disclosed at least on Col. 4, lines 40-50 of Pruett which discloses that "an owner of a functional group may be permitted to view any data stored in loaded block 56 which pertains to the functional group."

On the other hand, the method of the present invention as recited in claim 1, recites *inter-alia* a functional group having a unique ATM address, the functional group including a plurality of servers and each of the plurality of servers being assigned a unique ATM address. Further, the selection of server from a functional group is transparent to the client. The details of this concept is explained in great detail in the present specification on pages 3-4. The client of the present invention requesting the virtual circuit need not know the individual address of any of the servers in the group/functional group, only the address of the functional group itself. The selection of a

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particular server is transparent to the client. The client is therefore relieved of the responsibility of handling failed requests for connection.

In sharp contrast to the selection process of a server within a functional group, the selection process being transparent to a client as recited in claim 1 of the present invention, the client of Pruett (project manager) affirmatively makes a selection of a particular server within a functional group in order to compile and report computer network information, and thus is deemed to be aware of the selection of a server. Thus, the server selection process is clearly not transparent to the client (project manager). Thus, the disclosure of Pruett teaches away from the present invention as recited in claim 1.

Basso discloses a method for using an IP address-based routing protocol in an ATM environment. It discloses a method of mapping ATM addresses into IP address, enabling the continued use of IP based routing protocols. Basso fails to teach the deficiencies of Pruett as noted above.

Thus, at least in view of the above, Applicant respectfully submits that claim 1 is patentably distinct over prior art of record. Neither Pruett nor Basso, independently or in combination, teach or suggest all the requirements of claim 1 of the present invention. Applicants respectfully urges that the rejection of claim 1 and its dependent claims be withdrawn and that they be passed to allowance.

Applicant's argument with respect to claim 1 apply to independent claims 6, 14, and 22 as well. Applicants, therefore, respectfully urge that the rejection of claims 6, 14, and 22 and their respective dependent claims be withdrawn and that they be passed to allowance.
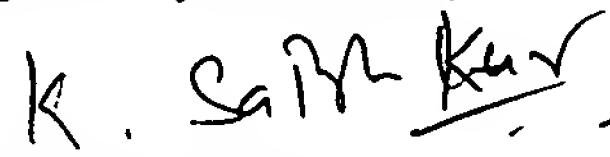
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Conclusion

It is respectfully submitted that the present application is in proper form for allowance. Reconsideration of the application and allowance of the claims are requested. An early notice of allowance on the merits is earnestly solicited. The examiner is requested to call the undersigned should there be any further inquiries regarding this application.

Respectfully submitted,

Satheesh K. Karra

Registration No. 40,246

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Worldcom, Inc.
1133 19th Street, N.W
Washington, D.C 20036